

evaluations not only insure that NRAO's interference concerns are addressed in the development of an application, but are useful to applicants in optimizing facility locations and minimizing site acquisition and development costs. Advance coordination ultimately streamlines the formal application process because NRAO's interference concerns are usually adequately addressed in the preliminary evaluation.

6. The informal nature of the preliminary evaluations has been extremely useful in establishing productive dialogue between NRAO and applicants. To preserve the informality and productive dialogue, the NRAO recommends that the Commission's rules simply encourage advance coordination instead of requiring advance coordination on a specific timescale.

7. The NRAO strongly believes that cross-references to Section 1.924 of the Commission's rules should be retained to insure that applicants are made aware of the requirement to coordinate with the affected Quiet Zone entity. The NRAO recommends adding cross-references to Section 1.924 to those sections of the Commission's rules that

govern geographic area licensing (part 90). Currently, applicants in possession of geographic area licenses are not required to notify the Commission of the details and locations of their facilities. But the NRAO needs this information to evaluate the interference potential of facilities installed within the NRQZ. The only way for NRAO to learn of these installations is through the Commission or through direct communication from the applicant.

8. Furthermore, the NRAO recommends adding cross-references to Section 1.924 to Section 90.119(b) of the Commission's rules, where applicants are not required to provide site data for control stations. The NRAO needs the site data to evaluate the interference potential of the control stations within the NRQZ. The rules should state that all site data for control stations, including coordinates, should be provided to Quiet Zones for frequency coordination. Recent experience has shown that NRAO needs advance coordination in order to avoid serious potential interference problems.

Respectfully submitted,

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